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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KAYLA GAGNON,

Plaintiff,

v.

REVIVE HEALTH SENIOR CARE
MANAGEMENT, LLC, a domestic limited
liability company, doing business as ALTA
SKILLED NURSING AND
REHABILITATION CENTER; and DOES I-
XX inclusive,

Defendant.

Case No. 3:25-cv-00035-CSD

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S DEADLINE TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT**

(First Request)

Defendant Revive Health Senior Care Management, LLC doing business as Alta Skilled Nursing and Rehabilitation Center ("Revive" or "Defendant") and Plaintiff Kayla Gagnon ("Gagnon" or "Plaintiff"), by and through their respective counsel of record, hereby agree, stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint by fourteen (14) days, from February 14, 2025 to February 28, 2025. This is the first request to extend this deadline. The parties agree to the extension to permit Plaintiff time to amend her Complaint and Defendant time to fully evaluate the allegations in the Amended Complaint and prepare an appropriate response.

1 The undersigned represent that this stipulation is not designed for purposes of delay.

2 Dated: February 12, 2025.

3 McDONALD CARANO LLP

JEPSEN LAW, PLLC

4 By: /s/ Daniel I. Aquino

By: /s/ Kendra J. Jepsen

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Attorneys for Defendant

11 IT IS SO ORDERED:

12 

13 UNITED STATES MAGISTRATE JUDGE

14 DATED: February 13, 2025